

23cr261 NEB/LIB

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,)	INDICTMENT
)	
Plaintiff,)	21 U.S.C. § 843(a)(3)
)	21 U.S.C. § 843(d)(1)
v.)	
)	
CAMBIE ELIZABETH BROKER,)	
)	
Defendant.)	

THE UNITED STATES GRAND JURY CHARGES THAT:

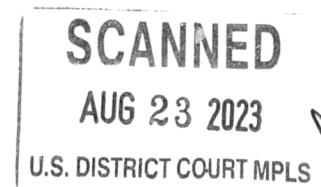
COUNT 1

(Obtaining a Controlled Substance by Fraud)

Between in or about November 17, 2020, and November 25, 2022, in the State and District of Minnesota, the defendant,

CAMBIE ELIZABETH BROKER,

knowingly and intentionally obtained and acquired oxycodone, hydromorphone, and N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide (commonly called "fentanyl"), all controlled substances, by misrepresentation, fraud, deception, and subterfuge, to wit, while employed as an RN Case Manager at St. Croix Hospice in Baxter, Minnesota, the defendant manually entered false prescription requests into St. Croix Hospice's e-prescribing software, the defendant obtained and acquired medications, namely, oxycodone, hydrocodone, hydromorphone, and fentanyl, for illegal sale



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and personal use, all in violation of Title 21, United States Code, Sections 843(a)(3) and 843(d)(1).

FORFEITURE ALLEGATIONS

Upon conviction of this Indictment, the defendant shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853(a)(1) and (2), any and all property constituting, or derived from, any proceeds the defendant obtained directly or indirectly as a result of said violations, and any and all property used, or intended to be used, in any manner or part to commit or to facilitate the commission of said violations. If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON